

Joseph D. Jean, Esq.  
Scott D. Greenspan, Esq.  
**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**  
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New York, NY 10019  
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*Special Insurance Counsel to the Debtor  
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**SECOND MONTHLY FEE STATEMENT OF  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED AS  
SPECIAL INSURANCE COUNSEL FOR DEBTOR FOR PERIOD  
FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pillsbury Winthrop Shaw Pittman LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	August 12, 2022, <i>nunc pro tunc</i> June 29, 2022
Period for which compensation and reimbursement is sought:	August 1, 2022 through August 31, 2022
Monthly Fees Incurred:	\$116,662.70
20% Holdback:	\$23,332.54
Total Compensation Less 20% Holdback:	\$93,330.16
Monthly Expenses Incurred:	\$330.23
Total Fees and Expenses Due:	\$93,660.39
This is a: <u>  X  </u> monthly <u>      </u> interim <u>      </u> final application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the *Order Authorizing the Retention and Employment of Pillsbury Winthrop Shaw Pittman LLP as Special Insurance Counsel for Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date* [Docket No. 123] (the “Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>2</sup> Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), special insurance counsel for the above-captioned debtor and debtor in possession (collectively, the “Debtor”)

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<sup>2</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

hereby submits this second monthly fee statement (the “Second Monthly Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtor, for the period from August 1, 2022 through August 31, 2022 (the “Second Monthly Fee Period”). By this Second Monthly Fee Statement, Pillsbury seeks payment in the amount of \$93,660.39, which is comprised of (i) \$93,330.16, which represents eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the Second Monthly Fee Period, and (ii) reimbursement of \$330.23, which represents one hundred percent (100%) of actual and necessary expenses incurred in connection with such services, subject in each case to certain voluntary reductions.

**Services Rendered and Expenses Incurred**

1. Attached as **Exhibit A** is a summary of Pillsbury’s professionals by individual, setting forth the (i) name, title, and department of each individual who provided services in connection with this chapter 11 case during the Second Monthly Fee Period, (ii) aggregate hours spent by each individual, (iii) hourly billing rate for each such individual at Pillsbury’s current billing rates, (iv) amount of fees earned by each Pillsbury professional, and (v) the year of bar admission for each attorney. The blended hourly billing rate of Pillsbury attorneys during the Second Monthly Fee Period is approximately \$1,005.73. The blended hourly rate for Senior Law Clerks is \$540.00. The blended hourly rate of legal assistants during the Second Monthly Fee Period is approximately \$397.69.

2. Attached as **Exhibit B** is a summary of the services rendered and compensation sought, by project category, for the Second Monthly Fee Period.

3. Attached as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Second Monthly Fee Period.

4. Attached as **Exhibit D** is itemized time detail of Pillsbury professionals for the Second Monthly Fee Period and summary materials related thereto.

**Notice and Objection Procedures**

5. Notice of this Second Monthly Fee Statement shall be given by hand or overnight delivery or email where available upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian, Jeffrey Dold); (b) Debtor's counsel, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber); (c) counsel to the United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian); and (d) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017 (Attn.: James Stang, John W. Lucas and Gillian N. Brown).

6. Objections to this Second Monthly Fee Statement, if any, must be filed with the Court and served upon Pillsbury and the other Notice Parties so as to be received no later than **fifteen (15) days after filing of Fee Statement** (the "**Objection Deadline**"), setting forth the nature of the objection and the amount of fees or expenses at issue (an "**Objection**").

7. If no objections to this Second Monthly Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

8. If an objection to this Second Monthly Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Second Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved,

it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

New York, New York  
Dated: September 20, 2022

/s/ Joseph D. Jean

Joseph D. Jean, Esq.

Scott D. Greenspan, Esq.

**PILLSBURY WINTHROP SHAW PITTMAN,  
LLP**

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New York, NY 10019

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joseph.jean@pillsburylaw.com

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*Special Insurance Counsel to the Debtor and Debtor in Possession*

**Exhibit A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

Name of Professional Partners and Counsel	Title	Department	Year Admitted	Standard Hourly Rate (\$)	10% Discounted Hourly Rate (\$)	Total Billed Hours	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	1998	\$1,570.00	\$1,413.00	14.7	\$20,771.10
Barbara L. Crouch	Senior Counsel	Litigation	1990	\$1,225.00	\$1,103.00	32.0	\$35,296.00
Scott D. Greenspan	Senior Counsel	Litigation	1996	\$1,110.00	\$999.00	41.7	\$41,658.30
<b>Total Partners and Counsel:</b>						<b>#88.4</b>	<b>\$97,725.40</b>

Name of Associates	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Billed Hours	Total Compensation (\$)
Bryan J. Coffey	Litigation	2012	\$520.00	\$468.00	16.4	\$7,675.20
<b>Total Associates:</b>					<b>#16.4</b>	<b>\$7,675.20</b>

Name of Sr. Law Clerks	Department	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Billed Hours	Total Compensation (\$)
Kristina Sgambati	Litigation	\$600.00	\$540.00	6.2	\$3,348.00
<b>Total Associates:</b>				<b>#6.2</b>	<b>\$3,348.00</b>

Name of Paralegals and other Non-Legal Staff	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$) <sup>3</sup>	Total Billed Hours	Total Compensation (\$)
April Iniguez	\$425.00	\$383.00	2.7	\$1,034.10
Stephanie Korchinski	\$575.00	\$400.00	17.2	\$6,880.00
<b>Total Associates:</b>			<b>#19.9</b>	<b>\$7,914.10</b>

<sup>3</sup> Paralegal billable rates include a 10% discount off standard rates or a \$400.00 cap on hourly rates for paralegals, whichever results in a lower rate.

<b>PROFESSIONALS</b>	<b>10% Discounted Blended Rate (\$)</b>	<b>TOTAL BILLED HOURS</b>	<b>TOTAL COMPENSATION (\$)</b>
Partners and Counsel	\$1,105.49	88.4	\$97,725.40
Associates	\$468.00	16.4	\$7,675.20
Sr. Law Clerks	\$540.00	6.2	\$3,348.00
Paralegals/Non-Legal Staff	\$397.69	19.9	\$7,914.10
Blended Attorney Rate	\$1,005.73	104.8	\$105,400.60
<b>Total Fees Incurred</b>		<b>130.9</b>	<b>\$116,662.70</b>



**Exhibit B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE  
FOR THE PERIOD FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
701	Case Administration		
702	Asset Analysis and Recovery	69.2	\$54,860.60
705	Fee/Employment Applications	1.0	\$400.00
706	Fee/Employment Objections		
707	Mediation	60.7	\$61,402.10
708	Claims Administration and Objections		
710	Litigation		
711	Court Hearings		
712	Cash Collateral/DIP Financing/Exit Financing		
713	Lease/Executory Contract Issues		
714	First Day Hearing Preparation		
715	Creditor Inquiries		
716	Corporate Governance and Board Matters		
	<b>TOTAL</b>	<b>130.9</b>	<b>\$116,662.70</b>

**Exhibit C**

**Expense Summary**

**AGGREGATE ITEMIZED DISBURSEMENTS FOR THE PERIOD  
FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

<b>Expenses Category</b>	<b>Total Expenses (\$)</b>
Court Costs & Litigation Expenses	
Information Retrieval Services	\$3.50
Reporting Services	
Overtime – Meals	
Duplicating and Word Processing	\$84.56
Taxi	
Business Expenses	\$242.17
Miscellaneous	
<b>TOTAL</b>	<b>\$330.23</b>

**Exhibit D**

**Itemized Time Detail**



Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

September 19, 2022  
Invoice No. 8492222  
Client No. 055278  
Matter No. 0000002  
Michael Kosnitzky  
(786) 913-4900

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**For Professional Services Rendered and Disbursements Incurred through August 31, 2022**

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 116,662.70	\$ 330.23	\$ 116,992.93
<b>Total This Invoice:</b>	<b>\$ 116,662.70</b>	<b>\$ 330.23</b>	<b>\$ 116,992.93</b>

*Current charges only. Time and disbursements not yet recorded will be included in future invoices.*

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**Pillsbury Winthrop Shaw Pittman LLP**  
**600 Brickell Avenue, Suite 3100 - Miami, FL - 33131**  
*Due Upon Receipt*  
**Remittance Address**  
**P.O. Box 30769 . New York, NY 10087-0769**

Client No: 055278  
Matter No: 0000002  
Michael Kosnitzky

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## Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through August 31, 2022

### Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 702 - Asset Analysis and Recovery</u>				
B. L. Croutch	08/01/22	Emails with B. Baker re: years of alleged abuse issues (.4); multiple emails from/to M. Levi re: insurance issues for mediation statement (.6); multiple emails with M. Pierro re: same (.6); emails with J. Jean re: US Trustee's comments re: Pillsbury retention (.4); draft supplemental declaration to file for Pillsbury retention (.9); email from M. Levi re: additional conflicts to check (.1); review firm conflicts check results and provide comments to M. Levi (.3).	3.30	\$3,639.90
A. Iniguez	08/02/22	Review correspondence from D. Walters, Security Mutual Insurance Co. in response to 7/28/22 tender letter (.1); update chart re: same (.1).	0.20	76.60
B. L. Croutch	08/03/22	Review updated insurance graph chart (.6); review further responses from M. Pierro (.3); further respond to M. Levi (.3); conference IAG and M. Levi (.4); review J. Jean comments to draft supplemental declaration (.3); revise declaration re: same (.4); email from M. Levi re: additional insurance questions (.2); emails responses re: same (.2).	2.70	2,978.10
A. Iniguez	08/03/22	Review email from New York Liquidation Bureau Receiver Operations in response to 7.28.22 tender letter re 38 complaints (.1); update chart re: same (.1).	0.20	76.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/04/22	Review revised draft supplemental J. Jean declaration and proposed order from PW firm re: appointment of Pillsbury as insurance coverage counsel (.2); emails with J. Jean re: same (.3); emails with M. Levi re: same (.3); email to A. Schwartz (US Trustee) re: supplemental declaration, proposed order and next steps (.2); multiple emails from I. Nasatir re: evidence of new coverage discovered and questions with him re: same (.4); emails with M. Levi and M. Pierro re: same (.3); confer with J. Jean re: preparation of policy/coverage chart and inclusion of policy information (.3).	2.00	2,206.00
J. D. Jean	08/04/22	Confer with B. Croutch re: policy chart and inclusion of policy information.	0.30	423.90
J. D. Jean	08/04/22	Emails with B. Croutch and PW re: request for insurance information from plaintiffs' ad hoc counsel (.4); confer re: same (.3).	0.70	989.10
B. L. Croutch	08/05/22	Conference with PW and IAG regarding upcoming meeting with I. Nasatir regarding insurance.	0.60	661.80
B. L. Croutch	08/08/22	Emails from M. Levi re: additional parties for conflicts purposes (.2); call from S. Ravit re: Security Mutual tender letter (.2); emails with IAG re: same (.3); emails with A. Iniguez re: wrong Sirius company served and to correct (.3); emails re: billing rates and US Trustee's office (.2); revise supplemental J. Jean declaration and proposed order for Pillsbury retention application (.4); confer with J. Jean re: insurance coverage issues and call with plaintiffs' Ad Hoc Committee (.4).	2.00	2,206.00
A. Iniguez	08/08/22	Emails from attorney forwarding voice mail from CEO of Sirius Group served tender letter (.2); review same (.1); research regarding Sirius v. Sirius International Insurance Group (.6); research on internet New York Secretary of State for correct company (.8); emails re: correct address for Sirius (.1).	1.80	689.40



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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	08/08/22	Confer with B. Croutch re: insurance coverage issues and call with plaintiffs' ad hoc committee member (.4); conference re: recovery and pursuit of any outstanding fees and indemnity payments (.4).	0.80	1,130.40
B. L. Croutch	08/09/22	Review conflicts reports for schedule for supplemental declaration re: PWSP retention (.6); conference with I. Nasatir (Pachulski Stang Ziehl & Jones law firm) re: insurance information and questions they have (.6); follow up emails with PW firm re: same (.4).	1.60	1,764.80
A. Iniguez	08/09/22	Review envelopes of tender letters to Empire and Puritan Insurance sent on 7.28.2022 (.2); update chart of correspondence regarding same (.1).	0.30	114.90
B. L. Croutch	08/10/22	Conference with M. Pierro (IAG) and M. Levi re: insurance issues requested by I. Nasatir (.6); review and analyze requested information and prepare coverage charts (2.1); emails from M. Pierro re: same (.3); follow up conference call with IAG re: same (.4).	3.40	3,750.20
B. L. Croutch	08/11/22	Attend bankruptcy hearing for retention motions, etc. (1.6); emails with J. Jean re: National Union and AIG (.3); prepare response to email from National Union and AIG's counsel re: mediation and insurance coverage issues (.3); emails from and prepare emails to N. Valenza-Frost re: AIG and National Union (.4).	2.60	2,867.80
J. D. Jean	08/12/22	Confer with B. Croutch re: memo re: status and strategy.	0.40	565.20
J. D. Jean	08/15/22	Review correspondence re: insurance coverage and requests from ad hoc committee.	0.40	565.20
J. D. Jean	08/15/22	Confer with B. Croutch re: insurance coverage and requests from ad hoc committee.	0.20	282.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/16/22	Prepare for and attend conference with IAG and PW Firm re: insurance issues and charts requested by I. Nasatir (Pachulski law firm) (.8); emails from JH Strauss re: D&O insurance and provide responses re: same (.4); emails from JH Strauss re: insurance and next steps (.3); call from IAG re: plaintiffs and dates of alleged injuries (.3); prepare detailed information for IAG re: plaintiffs and dates of alleged injuries (.8).	2.60	2,867.80
B. L. Croutch	08/17/22	Emails with IAG re: insurance issues.	0.40	441.20
S. D. Greenspan	08/17/22	Correspondence with J. Jean re: assuming the matter and coverage strategy for the matter.	0.20	199.80
S. D. Greenspan	08/18/22	Correspondence with W. Clareman, J. Jean and B. Crouch re: moving forward with coverage strategy and preparing for mediation.	0.30	299.70
J. D. Jean	08/19/22	Review emails with J. Stand re: policy search and slotting chart (.2); review coverage issues re: primary secondary coverage evidence (.6).	0.80	1,130.40
J. D. Jean	08/19/22	Confer with S. Greenspan re: coverage information and missing policies.	0.40	565.20
B. J. Coffey	08/24/22	Review policy evidence and create coverage chart of policies implicated by abuse claims (.6); conferences with S. Greenspan re: same (.2).	0.80	374.40
S. Korchinski	08/24/22	Review policies and compare to chart in preparation of revising coverage chart (2.6); review additional materials for policies not previously included in review/comparison (.7); review and organize additional policies for inclusion on coverage chart (.4); review documentation for summary of claimants by year over time (.4).	4.10	1,640.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/25/22	Conference with M. Pierro at IAG and S. Greenspan re: insurance archeology efforts and follow up requests to insurers (.4); research corporate history of insurance companies called Security Mutual to determine identity of potential successors (1.4); Review policy evidence and create coverage chart of policies implicated by abuse claims (2.8).	4.60	2,152.80
S. Korchinski	08/25/22	Review and organize evidence of insurance materials (3.6); conference with J. Jean re: coverage issues, plaintiffs and damages (.3); review document collection for policies at issue in 2019 litigation and orders re: summary judgment and appeal of same (.3).	4.20	1,680.00
B. J. Coffey	08/26/22	Review policy evidence and create coverage chart of policies implicated by abuse claims (4.6); correspondence with S. Greenspan re: same (.2).	4.80	2,246.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/26/22	Review and analyze revised draft coverage chart of GL policies and correspondence with B. Coffey re: same and re: further revisions to same (.4); review research memo and cited caselaw re: sexual abuse exclusion under New York law and correspondence with K. Sgambati re: same (.9); review and analyze insurance presentation in connection with preparation of insurance program analysis for the mediator (.3); correspondence with PW team re: aggregate limit issue on the policies and review IAG analysis re: same (.3); review correspondence/documentation re: secondary evidence of GL insurance policies in connection with preparation of insurance program analysis for the mediator (.4); review IAG proposed revisions to the draft mediation statement re: insurance program and insurance issues (.4); review and analyze letters from Chubb (INA/Federal), Allianz (Jefferson), and Carlton Fields (attorneys for AIG), transmitting the new policy documents/information obtained from these carriers in July, 2022 (.4).	3.10	3,096.90
S. Korchinski	08/26/22	Conference with K. Sgambati re: sexual misconduct endorsement review (.2); assemble documents for policy/insurance evidence binder (1.2); draft index to same (.7).	2.10	840.00
K. Sgambati	08/26/22	Review policy exclusions in current and previous litigation.	0.60	324.00
K. Sgambati	08/26/22	Research into applicability of sexual misconduct policy exclusions (5.2); conference with S. Korchinski re: same (.1); correspondence with S. Greenspan re: same (.3).	5.60	3,024.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/29/22	Review summary of insurance coverage evidence revised by PW and IAG to compare against Pillsbury coverage chart and draft summary of differences between IAG and Pillsbury charts (.9); conferences with M. Pierro at IAG re: analysis of secondary evidence of coverage (.6); review reinsurance information for evidence of coverage and appropriateness for sharing with insurer (.4); make revisions to coverage chart (.7).	2.60	1,216.80
S. Korchinski	08/30/22	Review correspondence for insurer acceptance of coverage post filing of petition (.6); review document collection for research memo (.6).	1.20	480.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/31/22	Conference with PW team and B. Coffey re: revisions to draft mediation statement regarding the insurance program and insurance issues (.7); conference with B. Coffey re: same (.2); correspondence with J. Jean re: revisions to the draft mediation statement in light of PW team's suggested revisions (.4); correspondence/conference with B. Coffey re: preparing analysis valuing the insurance program (.4); correspondence with J. Jean re: same (.2); correspondence with M. Pierro re: revised coverage chart and review IAG revise coverage chart (.3); correspondence with PW team re: amount of Friedman Kaplan defense costs in toto and that were unpaid by the carriers in connection with preparation of mediation statement and review responses (.4); correspondence with PW team and J. Jean re: sending coverage chart to policyholder's counsel (.4); correspondence with J. Jean re: insurers' anticipated position on the BI aggregate limit issue (.2); correspondence/conferences with B. Coffey re: allocation of demands across the policies in connection with preparation of mediation statements (.3); review and revise proposed allocation of demands across the policies in connection with preparation of mediation statements (.4); revise draft mediation statement re: insurance program and insurance issues (2.4); correspondence with PW team and with J. Jean re: same (.4); correspondence with PW team and J. Jean re: providing coverage chart to plaintiffs' counsel (.3); conference with P. Blood re: research assignment on trigger of coverage issue (.3).	7.30	7,292.70
<b>Subtotal Task: 702 - Asset Analysis and Recovery</b>			<b>69.20</b>	<b>\$54,860.60</b>

Task: 705 - Fee/Employment Applications

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	08/28/22	Draft fee application for the period June 29 through July 31, 2022.	1.00	\$400.00

<b>Subtotal Task: 705 - Fee/Employment Applications</b>	<b>1.00</b>	<b>\$400.00</b>
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Task: 707 - Mediation

J. D. Jean	08/01/22	Review and respond to emails re: coverage issues and mediation statement.	0.20	\$282.60
J. D. Jean	08/01/22	Confer with B. Croutch re: mediation statement.	0.20	282.60
B. L. Croutch	08/02/22	Emails with J. Jean re: thoughts on responding to US Trustee re: Pillsbury retention issues (.4); research issues with prior engagements with client and billing rates for supplemental declaration (.8); email from B. Baker re: CVA cases (.2); review update on Prokopiak action (.1); Conference with M. Levi re: US Trustee's comments and provide responses (.6); multiple emails with PW Firm re: billing rates issues for pre-petition v. post-petition (.6); letter from D. Walters, Claims Director of Security Mutual re: no tender acceptance (.2); prepare supplemental declaration of J. Jean (.9); email from M. Levi re: detailed information needed for mediation statement (.2); emails with M. Pierro re: same (.4); conference with M. Pierro re: same (.4); prepare detailed responses to M. Levi (.7); emails to J. Strauss re: recent insurance correspondences for plaintiffs' ad hoc committee (.2).	5.70	6,287.10
J. D. Jean	08/02/22	Review and respond to emails re: engagement and coverage issues.	0.60	847.80
J. D. Jean	08/03/22	Review and revise engagement declaration (.4); review and respond to emails re: coverage and mediation (4).	0.80	1,130.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/12/22	Review emails from and prepare emails to A. Kornberg re: conference with mediator (.2); prepare and revise detailed case report and status update for J. Jean (1.6); confer with J. Jean re: memo with respect to status and strategy (.4).	2.20	2,426.60
B. L. Croutch	08/15/22	Prepare for and attend conference with mediator and PW team (1.0); review latest documents from IAG for information requested by I. Nasatir (Pachulski law firm) (.5); emails and follow up conference with M. Pierro re: same (.4).	1.90	2,095.70
A. Iniguez	08/15/22	Emails re: returned envelopes of 7.28.22 tender letter (.1); update chart re: same (.1).	0.20	76.60
B. L. Croutch	08/18/22	Emails from/to J. Strauss re: mediation and PW Team starting mediator's request to then send for J. Jean's review and comments per PW (.6); emails with IAG re: TB plaintiff and date of alleged injuries (.4).	1.00	1,103.00
J. D. Jean	08/18/22	Confer with B. Croutch re: insurance request from mediator and PW's emails re: same.	0.90	1,271.70
S. D. Greenspan	08/19/22	Review and analyze memo summarizing the status of this matter including the search for additional policies and second evidence, tenders to newly identified carriers and others issues in connection with preparation of coverage strategy (.3); prepare correspondence to and review correspondence from J. Jean and B. Croutch re: coverage strategy, insurance policy search and preparation for mediation (.4); review and analyze letter from Philadelphia to the Committee of Unsecured Creditors responding to the Committee's document demand (.3); review and analyze draft coverage chart and slotting chart in connection with development of analysis of the value of the policies for mediation (.6).	1.60	1,598.40



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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/19/22	Correspondence with W. Clareman re: preparation for the insurance aspects of mediation.	0.20	199.80
S. D. Greenspan	08/23/22	Correspondence with J. Jean and S. Korchinski re: preparation of mediation statement (.3); prepare for (review of files) and conference with S. Korchinski re: preparation of coverage chart and re: policy analysis for the mediation (.8); review and analyze PW draft of mediation statement, PW Insurance Generations and textual coverage chart in connection with preparation of statement for mediator re: Madison Square's insurance program (.9); review and analyze latest version of coverage chart and memorandum analyzing Madison's Chubb/Federal policies in connection with coverage analysis (.6); review correspondence re: preparation of slotting chart in connection with preparation of insurers' exposure analysis for the mediator (.4); review and analyze letter from Jefferson Insurance Co. of New York agreeing to defend (.3); conference with J. Jean re: mediation issues (.3).	3.70	3,696.30
J. D. Jean	08/23/22	Conference with S. Greenspan re: mediation issues (.3); emails re: J. Chapman request re: insurance materials (.3).	0.60	847.80
J. D. Jean	08/23/22	Review materials re: J. Chapman request.	0.30	423.90
S. Korchinski	08/23/22	Review and analyze email re: request for coverage chart (.8); review draft statement of insurance coverage for mediator in connection with drafting of same (.2); review and organize policies and secondary evidence while drafting list of same to be used as basis for coverage chart for mediator (2.6); conference with S. Greenspan re: specifics of policy collection/review and update of coverage chart (.4); review files for Allianz letter questioning aggregates and policies referenced in same for use in preparation of response (.6).	4.60	1,840.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/24/22	Conference with PW team re: mediation strategy and insurance issues in connection with same (.5); review and revise draft GL coverage chart and correspondence and conferences with B. Coffey and S. Korchinski re: same (.7); review and analyze summary of policies produced by Chubb in connection with preparation of insurance program analysis for the mediator (.3); review and analyze letter from Chubb re: discovery of INA umbrella policies and request for information re: policy search (.2); review and analyze memorandum re: summary of Chubb policy history (in connection with preparation of mediation statement) (.3); review and analyze memorandum re: list of insurance policies by parent corporation in connection with preparation of mediation statement (.2); review draft IAG-prepared coverage chart and chart of perpetrators in connection with preparation of insurance program analysis for the mediator (.3); conference with K. Sgambati re: research assignment re: sexual abuse exclusions in the GL policies and correspondence with B. Coffey and S. Korchinski re: same (.4); correspondence with L. Varga re: insurance archeology and underlying cases in connection with preparation of mediation statement (.2); correspondence with B. Coffey re: setting up call with M. Pierro of IAG re: insurance archeology (.2); confer with J. Jean re: policies, plaintiffs, limits and secondary evidence (.6).	3.90	3,896.10
J. D. Jean	08/24/22	Confer with PW team re: mediation.	0.60	847.80
J. D. Jean	08/24/22	Confer with S. Greenspan re: policies, plaintiffs, limits and secondary evidence.	0.60	847.80
J. D. Jean	08/24/22	Review and respond to emails re: policies, plaintiffs, limits and secondary evidence and re: coverage charts and mediation statement to mediator.	0.60	847.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/25/22	Correspondence with B. Coffey re: setting up call with M. Pierro of IAG re: insurance archaeology (.2); prepare for and attend conference with M. Pierro of IAG and B. Coffey re: location and analysis of GL policies in Madison Square program in preparation for mediation/mediation statement (1.0); review correspondence with M. Pierro re: insurance archeology issues in connection with preparation of insurance program analysis for the mediator (.2); review and analyze the management liability policies and the First Department decision construing them in connection with analysis of sexual abuse exclusions in GL policies and correspondence with S. Korschinki re: same (.4); review and analyze tender letters and responses sent to carriers on newly-discovered policies post-petition (.7); conference with J. Jean re: mediation and preparation of coverage chart and mediation statement (.3).	2.80	2,797.20
J. D. Jean	08/25/22	Confer with S. Greenspan re: mediation and preparation of mediation statement and coverage chart (.3); confer with S. Korchinski re: coverage issues, plaintiffs and damages (.3).	0.60	847.80
S. D. Greenspan	08/28/22	Conference with J. Jean re: mediation statement and evidence of insurance in same.	0.40	399.60
J. D. Jean	08/28/22	Confer with S. Greenspan re: mediation statement and evidence of insurance.	0.40	565.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/29/22	Prepare and revise draft mediation statement re: insurance program and insurance issues and extensive correspondence and conferences with Pillsbury and PW teams and policy review in connection with same (7.8); correspondence with J. Jean re: revisions to coverage chart to be provided to mediator (.2); review and analyze IAG coverage chart vs. Pillsbury coverage chart and revise Pillsbury coverage chart (.4); conference with PW team re: preparation of mediation statement concerning insurance issues (.5); correspondence with PW team re: refining the IAG coverage chart and reconciling the IAG and Pillsbury coverage charts and identification of areas needing resolution (.7); correspondence with PW team re: preparation and content of slotting chart.	9.60	9,590.40
B. J. Coffey	08/30/22	Review policy evidence and revise coverage chart (.3); conference with L. Varga at Paul Weiss, M. Pierro at IAG, and S. Greenspan to discuss policy evidence and coverage chart (.4); draft summary and assessment of quality of insurance secondary evidence (.4); correspondence with S. Greenspan re: revisions to mediation statement (.3).	1.40	655.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/30/22	Conference with PW team and B. Baker of Friedman Kaplan re: mediation and insurance coverage pursuit strategies (.8); conference with L. Varga re: revisions to coverage chart (.4); conference with M. Pierro of IAG and B. Coffey re: revisions to coverage chart and re: insurance archeology issues (.4); extensive correspondence with PW team re: same (.6); review Raphaelson Levine demand letter of October 27, 2021 for potential coverage under the GL policies, including all demands therein, and prepare correspondence to PW team analyzing same (1.2); review slotting chart and correspondence with PW team and M. Pierro re: impact on coverage chart of revisions to slotting chart (.6); review proposed revisions to draft mediation statement regarding the insurance program and insurance issues and revise same (2.7); extensive correspondence with PW team, J. Jean and B. Coffey re: revisions to same (.7); correspondence with L. Varga re: insurers accepting coverage/tender post-petition and review coverage correspondence in connection with same (.4); correspondence with PW team re: Covington report (.3); correspondence with PW team re: strategy call (.2); review memo re: secondary evidence of the Policies (in connection with preparation of mediation statement (.3).	8.60	8,591.40
J. D. Jean	08/30/22	Review and revise mediation memorandum and review policies re: same (1.2); review secondary evidence and follow up from call with PW team (.6).	1.80	2,543.40
J. D. Jean	08/30/22	Confer with S. Greenspan re: strategy.	0.40	565.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/31/22	Calculate potential limits of insurance coverage (.2); conference with W. Clareman of PW, M. Pierro of IAG and S. Greenspan re: summary of insurance coverage value for mediator (.4); conference with S. Greenspan re: allocation of claimant demands to available insurance (.2); review claimant demands and alleged time frames of occurrences to allocate claims to available insurance coverage and calculate potential impact to insurers (1.4).	2.20	1,029.60
J. D. Jean	08/31/22	Review and revise multiple drafts of mediation statement re: insurance while reviewing secondary evidence and demands re: same.	1.30	1,836.90
J. D. Jean	08/31/22	Confer with S. Greenspan re: mediation memo and meeting with PW team.	0.80	1,130.40
<b>Subtotal Task: 707 - Mediation</b>			<b>60.70</b>	<b>\$61,402.10</b>
<b>Total:</b>			<b>130.90</b>	<b>\$ 116,662.70</b>

#### Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
702 - Asset Analysis and Recovery	69.20	54,860.60
705 - Fee/Employment Applications	1.00	400.00
707 - Mediation	60.70	61,402.10
<b>Total</b>	<b>130.90</b>	<b>\$ 116,662.70</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
<b>Partner</b>			
J. D. Jean	14.70	\$1,413.00	\$20,771.10
<b>Senior Counsel</b>			
B. L. Croutch	32.00	\$1,103.00	\$35,296.00
S. D. Greenspan	41.70	999.00	41,658.30
<b>Subtotal</b>	<b>73.70</b>		<b>\$76,954.30</b>

#### Other Attorney

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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
B. J. Coffey	16.40	\$468.00	\$7,675.20
<b>Senior Law Clerk</b>			
K. Sgambati	6.20	\$540.00	\$3,348.00
<b>Paralegal</b>			
A. Iniguez	2.70	\$383.00	\$1,034.10
S. Korchinski	17.20	400.00	6,880.00
<b>Subtotal</b>	<b>19.90</b>		<b>\$7,914.10</b>
<b>Total</b>	<b>130.90</b>		<b>\$116,662.70</b>

#### Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
07/01/22	Task E106 - Computer Research	Summary	\$3.50
08/10/22	Task E103 - Document Processing	Summary	111.75
08/26/22	Task E101 - Reproductions	Summary	70.56
08/09/22	Task E101 - Blowback - Color	Color Copying	12.40
08/26/22	Task E101 - Color Copy	08/2022 Document Printing Charges, Job # 8, S. Korchinski	1.20
08/29/22	Task E101 - Color Copy	08/2022 Document Printing Charges, Job # 3, S. Greenspan	0.40
08/09/22	Task E107 - Express Courier Service	FedEX to CLAIMS MANAGER SIRIUS INT. INSURANCE GROUP, L from BARBARA CROUTCH	124.52
08/11/22	Task E107 - Express Courier Service	Vendor: SF Express/Shun Feng Logistics - BJ; Invoice#: 081122; Date: 8/11/2022 - Beijing Courier bill- July 2022 C. Liu, courier fee for sending letter and documents to Claims Manager of China Minsheng Investment Corp on 07/29/2022, SH	5.90
<b>Total Disbursements:</b>			<b>\$330.23</b>

#### Disbursement Summary

<u>Type</u>	<u>Amount</u>
Pillsbury Winthrop Shaw Pittman LLP	

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Color Copying	14.00
Computer Research	3.50
Document Processing	111.75
Express Courier Service	130.42
Reproductions	70.56
<b>Total:</b>	<b>\$330.23</b>

**Total Due For Matter 0000002: \$116,992.93**





Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

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Michael Kosnitzky  
(786) 913-4900

## Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 116,662.70	\$ 330.23	\$ 116,992.93
<b>Total This Invoice:</b>	<b>\$ 116,662.70</b>	<b>\$ 330.23</b>	<b>\$ 116,992.93</b>

*Payable in U.S. Dollars upon receipt.*

### Payment Options:

**For payment by mail, remit to:** Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

**For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:** JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to [accountsreceivable@pillsburylaw.com](mailto:accountsreceivable@pillsburylaw.com)]